



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 7
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KANSAS CITY, KANSAS 66115

JUL 11 1988

MEMORANDUM

SUBJECT: Review of Sampling, Analysis, and QA/QC Plan for Trial Burn at Monsanto - Queeny Plant

FROM: William W. Bunn *MG for*
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TO: Dale I. Bates
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The document entitled, "Sampling, Analysis, and QA/QC Plan for Trial Burn at Monsanto - Queeny Plant," dated June 20, 1988, has been reviewed with regard to analytical support issues. Only those portions of the document related to laboratory or analytical support matters were considered in this review. Specific comments are as follows:

- Table VI-2: Summary of Analysis Methods; EPA and ASTM methods are listed for the analysis of trial burn samples. These all appear to be the appropriate methods. Methods from the RCRA methods manual, SW-846, are referenced.

- Page 55: Analytical Procedure; The formula for the response factor is incorrect. The correct formula is:

$$RF = A_S C_{is} / A_{is} C_S$$

- Page 60: Table VII.1 - QA Measures for the Trial Burn; All QA/QC measures implemented must be consistent with those specified in the manuals summarized in Table VI-2.

- Page 69: VII. 9 - Internal QC Checks; All QC checks should have acceptance criteria developed prior to acceptance of trial burn samples. This would include criteria for spike recoveries, surrogate recoveries, method blanks, field blanks, instrument response to verify detection limits, etc.

- Page 71: VII. 10 - Performance and System Audits; Audit samples from external sources should be analyzed where possible to verify analytical accuracy. The VOST sampling method used in this trial burn, EPA Method 0030, requires that a performance audit be completed (page 0030-15). This involves requesting and analyzing audit cylinders from EPA.



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